

April 26, 2023

Mr. Mark E. Miller
Miller Law Offices
915 Main St.
Evansville, IN 47708

Re: Snukis

Dear Mr. Miller:

You have asked me to calculate the value of certain losses subsequent to the death of Edward Snukis. These losses are: (1) the loss of wages and employee benefits; (2) the loss of household/family services, including (a) the loss of the advice, counsel, guidance, instruction and training services sustained by Mr. Snukis's surviving family; (b) the loss of accompaniment services sustained by Mr. Snukis's surviving family; (3) the loss of the value of life ("LVL"), also known as loss of enjoyment of life; and (4) the loss of the society or relationship sustained by Mr. Snukis's surviving family.

QUALIFICATIONS AND EXPERIENCE

I am President of Smith Economics Group, Ltd., headquartered in Chicago, IL, which provides economic and financial consulting nationwide. I have worked as an economic and financial consultant since 1974, after completing a Research Internship at the Federal Reserve, Board of Governors, in Washington, D.C. My curriculum vitae lists all my publications in the last 10 years and beyond.

I received my Bachelor's Degree from Cornell University. I received a Master's Degree and my Ph.D. in Economics from the University of Chicago; Gary S. Becker, Nobel Laureate 1992, was my Ph.D. thesis advisor. The University of Chicago is one of the world's preeminent institutions for the study of economics, and the home of renowned research in the law and economics movement.

As President of Smith Economics, I have performed economic analyses in a great variety of engagements, including damages analysis in personal injury and wrongful death cases, business valuation, financial analysis, antitrust, contract losses, a wide range of class action matters, employment discrimination, defamation, and intellectual property valuations including evaluations of reasonable royalty.

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I have more than 40 years of experience in the field of economics. I am a member of various economic associations and served for three years as Vice President of the National Association of Forensic Economics (NAFE) which is the principal association in the field. I was also on the Board of Editors of the peer-reviewed journal, the Journal of Forensic Economics, for over a decade; I have also published scholarly articles in this journal. The JFE is the leading academic journal in the field of Forensic Economics.

I wrote the first textbook on Forensic Economic Damages that has been used in university courses such as the University of Wisconsin, Penn State University, and in various other states. As an adjunct professor, I created and taught the first course in Forensic Economics nationwide, at DePaul University in Chicago.

I am the creator and founder of Ibbotson Associates' Stock, Bonds, Bills, and Inflation (SBBI) Yearbook, Quarterly, Monthly, and SBBI/PC Services. SBBI is generally regarded by academics in the field of finance as the most widely accepted source of statistics on the rates of return on investment securities. SBBI was originally published by Ibbotson Associates, then by Morningstar, Inc., and is now currently published by Duff & Phelps. The original SBBI series generated what became a six-book set universally used for business valuation, and currently available on an online platform. These data series are widely relied upon and regarded as the most accepted and definitive scholarly references by the academic, actuarial and investment community, and in courts of law. All three publishers of the SBBI series acknowledge me as the founder in 1983, for my "invaluable role" as having "originated the idea" of SBBI, which I then implemented while Managing Director at Ibbotson Associates.

I have performed economic analysis in many thousands of cases in almost every state and federal jurisdiction since the early 1980s.

BACKGROUND

Edward Snukis was a 55.9-year-old, Caucasian, single male, who was born on October 15, 1963, and died on September 13, 2019. Mr. Snukis's remaining life expectancy is estimated at 25.0 years. This data is from the National Center for Health Statistics, United States Life Tables, 2018, Vol. 69, No. 12, National Vital Statistics Reports, 2021. I assume an estimated trial or resolution date of December 1, 2023.

In order to perform this evaluation, I have reviewed the following materials: (1) The Complaint and Demand for Jury Trial; (2) Plaintiffs' Answers to the City of Evansville, Indiana's

First Set of Interrogatories; (3) Plaintiffs' Answers to Matthew O. Taylor's First Set of Interrogatories; (4) Plaintiffs' Answers to Nicholas Hackworth's First Set of Interrogatories; (5) Plaintiffs' Answers to Trevor Koontz's First Set of Interrogatories; (6) Edward C. Snukis, Jr.'s deposition dated January 23, 2023; (7) Samantha Snukis' deposition dated January 16, 2023; (8) The Order on Defendants' Motion to Dismiss; (9) the Case Information form; and (10) the interviews of Edward Snukis, Jr., Samantha Snukis, and Sierra Snukis, dated April 5, 2023, April 19, 2023, and April 19, 2023, respectively.

My methodology for estimating the losses, which is explained below, is generally based on past wage growth, interest rates, and consumer prices, as well as studies regarding the value of life. The effective net discount rate using statistically average wage growth rates and statistically average discount rates is 0.25 percent.

My estimate of the real wage growth rate is 1.00 percent per year. This growth rate is based on Business Sector, Hourly Compensation growth data from the Major Sector Productivity and Costs Index found at the U.S. Bureau of Labor Statistics website at www.bls.gov/data/home.htm, Series ID: PRS84006103, for the real increase in wages primarily for the last 20 years.

My estimate of the real discount rate is 1.25 percent per year. This discount rate is based on primarily the rate of return on short-term U.S. Treasury investment for the last 20 years. The data is from the statistical series H.15 Selected Interest Rates, published by the Board of Governors of the Federal Reserve System found at www.federalreserve.gov. This data is also published in the Economic Report of the President Table for "Bond yields and interest rates" for the real return on U.S. Treasury investments.

Estimates of real growth and discount rates are net of inflation based on the Consumer Price Index (CPI-U), published in monthly issues of the U.S. Bureau of Labor Statistics, CPI Detailed Report (Washington, D.C.: U.S. Government Printing Office) and available at the U.S. Bureau of Labor Statistics website at www.bls.gov/data/home.htm, Series ID: CUUR0000SA0. The rate of inflation for the past 20 years has been 2.31 percent.

I. LOSS OF WAGES AND EMPLOYEE BENEFITS - Annual Employment

Tables 1 through 7 show the loss of wages and benefits. Edward Snukis's son, Edward Snukis, Jr., reports that his father was an independent contractor and had his own company called "Ed Snukis Contracting". Ed Snukis, Jr. notes that he had been working in construction since the mid 80's and it was his plan to continue with his business until he eventually retired at 67 or a few years past that age. He recalls that his dad had been running

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his company for the past 15 years in Pennsylvania. Edward Jr. reports that his dad would mostly lay concrete for residential projects and work as a subcontractor for the companies that hired him. He notes that his dad had other projects where he was working on the frames for the doors and windows as well. He also recalls that he usually had 3 to 4 people come help his dad on the jobs he worked which would sometimes include himself.

Edward Jr. reports that his father earned around \$80,000 to \$90,000 per year. He also notes that in 2014, his dad had lots of high paying jobs and put in lots of hours to earn around \$300,000 for the year. He reports that he expected his father to continually grow in earnings based on the relationships he was building with general contractors.

I illustrate Mr. Snukis's wages beginning in 2019 at \$93,410 in year 2021 dollars. This is based off of the mean annual salary of construction managers in the Southern Pennsylvania Nonmetropolitan Area. This information can be found at the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, May 2021 Occupational Employment and Wage Statistics found at www.BLS.GOV/OES. Wages are grown at national average wage growth rates of 3.83 percent in 2019, 8.45 percent in 2020; and at estimated growth rates of 6.0 percent in 2022, and 3.0 percent in 2023. Future wages are grown at 1.0 percent real.

Employee benefit estimates are based on data from the U.S. Department of Labor, Bureau of Labor Statistics, Employer Cost of Employee Compensation - December 2021, 2022, found at www.bls.gov/ect. I have assumed that employee benefits grow at the same rate as wages and are discounted to present value at the same discount rate. Since these tables assume annual work, I do not include employee benefits relating to unemployment, injury, illness or disability; benefits are estimated at 0 percent of wages.

Personal consumption is an offset of the income. I use a personal consumption offset based on a study by Ruble, Patton, and Nelson, "Patton-Nelson Personal Consumption Tables 2016-17," Journal of Legal Economics, Vol. 26, No. 1, 2020, pp. 221-225, based on data from the U.S. Department of Labor, Bureau of Labor Statistics, "Consumer Expenditure Survey, 2016-17," Washington DC, 2018, which shows personal consumption in this case to be 63.10 percent in 2019; 62.15 percent in 2020; and 60.05 percent thereafter.

I assume annual employment each year and show the accumulation through life expectancy. While these tables are calculated through the end of life expectancy, the losses from working through any age can be read off the table.

Based on the above assumptions, my opinion of the wage loss is

\$979,135 ▶ Table 7; this figure assumes work to age 80.9, but the ability to work through any assumed age may be read from Table 7; for example, the loss to age 67 is \$441,450.

II. LOSS OF HOUSEHOLD/FAMILY SERVICES

The following sections estimate the value of household/family services provided to Edward Snukis's children. These services do not include loss of love, care, or affection, etc., but are the tangible services, valued as if they were provided by a person unknown to the household. A discussion of these services can be found in the Household Services Valuation Appendix. The hourly value of these services grows at the same rate as the wage growth rate discussed above.

It is standard forensic economic practice to conduct an informational interview to obtain information to assist in estimating economic losses, a practice recommended by National Association of Forensic Economics charter member Professor Gerald Martin, Ph.D. in his 2012 edition of Determining Economic Damages, Section 611, James Publishing Group, Santa Ana, CA. Dr. Martin recommended this approach stating that this assessment can provide the expert "a basis for his estimate." Subsequent editions have continued to recommend this approach. Dr. Martin's Determining Economic Damages has been a widely referenced textbook in the field of Forensic Economics.

II(A). LOSS OF HOUSEHOLD/FAMILY ADVICE, COUNSEL, GUIDANCE, INSTRUCTION AND TRAINING SERVICES

Tables 8 through 15 show the pecuniary loss of advice, counsel, guidance, instruction and training services sustained by Mr. Snukis's children using the estimated market-based valuation cost method. Valuing the tangible, economic loss of household family services beyond the physical housekeeping chores is well-recognized in the economic literature and in caselaw. See, for example, Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure," Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, pp. 253-265, and Michigan Central v. Vreeland discussed in the Household Services Valuation Appendix. The tangible loss of advice, counsel, and guidance services is also discussed by Frank D. Tinari and Kristin Kucsma in Gerald D. Martin's Determining Economic Damages, James Publishing Group, Santa Ana, CA, 2009. Dr. Tinari and Ms. Kucsma state that advice, counsel, and guidance services are "the provision of helpful opinion, advice and information to ones's spouse, children, and elderly parents, as the need arises, in the areas of family problems, medical concerns, schooling, careers, finances, personal relationships, etc.."

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The hourly value of the loss is based on the mean hourly earnings of educational, guidance, and career counselors and advisors; marriage and family therapists; child, family and school social workers; social and human service assistants; clergy; directors, religious activities and education; coaches and scouts; elementary school teachers, except special education; and personal financial advisors, which is \$30.22 per hour in year 2021 dollars. This wage data is based on information from the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, May 2021 National Occupational Employment and Wage Statistics found at www.bls.gov/oes.

I assess such services at their estimated market value which includes a conservative estimate of 50 percent hourly non-wage component reasonably charged by agencies or free-lance individuals who supply such services on a part-time basis, and who are responsible for advertising, hiring and vetting, training, insuring and bonding the part-time service provider, and who are also responsible for pay-related costs such as the employer's share of social security contributions, etc. If a person were to hire a free-lance employee directly instead of going through an agency, then he or she would have to take on the responsibility for all the non-wage costs that the agency would otherwise incur and then charge for. The money the person would pay directly in wages would be only a portion of the total costs. The total costs would include those items discussed above that the agency would otherwise incur.

Adding the non-wage component to the hourly wage is consistent with labor market theory and competitive market behavior. Peer-reviewed economic research supports this theory and shows that the non-wage costs can average up to 300 percent for the wage. See, for example, Cushing, Matthew J. and David I. Rosenbaum, "Valuing Household Services: A New Look at the Replacement Cost Approach," Journal of Legal Economics, Vol 19, No. 1, 2012, pp. 37-60, wherein the authors say that there is a "divergence" between "market wage" rates paid to the employee and the "retail market" value of the services, amounting to 167 percent. The authors indicate a ratio of \$84.12 to \$31.54. This is more than triple the 50 percent non-wage costs amount I use, discussed above. Cushing and Rosenbaum also cite Smith, David A., Stan V. Smith, and Stephanie R. Uhl, "Estimating the Value of Family Household Management Services: Approaches and Markups," Forensic Rehabilitation & Economics, Vol 3, No. 2, 2010, pp. 85-94. According to this research, the statistical probability is 99 percent that the non-wage costs exceed 250 percent of the wage cost. The use of only a 50 percent non-wage cost makes my estimate very conservative, and it far more than compensates for two possible variations: variations in the national wage depending on locality, and variations in different types of services actually performed in the household. Thus even if one or more of the different types of services are not performed, and

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even if the services are provided in low wage areas, my use of the low, 50 percent non-wage costs more than compensates for these factors.

According to Sylvan Learning Centers, a national home tutorial agency, charges for their services within the largest 100 Metropolitan Statistical Areas with populations of 500,000 and up range from \$45 to \$55 per hour, averaging \$50 per hour. This reflects non-wage costs of well over 100 percent of wages, and is more than double the non-wage costs figure that I use, resulting in an hourly rate 40 percent higher than the rate I use. Thus my use of only a 50 percent addition for non-wage costs is, in fact, very conservative.

I illustrate the loss at 1 hour per day for Edward Snukis, Jr. through his father's life time; and at 0.5 hours per day for Samantha Snukis and Sierra Snukis through their father's lifetime, my opinion of the loss of advice, counsel, guidance, instruction and training as a result of the death of Edward Snukis is as follows:

\$435,631 ▶ Table 10 for Edward Snukis Jr.;
\$217,807 ▶ Table 13 for Samantha Snukis;
\$217,807 ▶ Table 16 for Sierra Snukis;

II(B). LOSS OF HOUSEHOLD/FAMILY ACCOMPANIMENT SERVICES

Tables 17 through 25 show the pecuniary loss of accompaniment services sustained by Mr. Snukis's children using the estimated market-based valuation cost method. Valuing the tangible economic loss of household family services beyond physical housekeeping chores is well-recognized in the economic literature and in caselaw. See, for example, Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure," Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, pp. 253-265, and Michigan Central v. Vreeland discussed in the Household Services Valuation Appendix. The tangible economic loss of accompaniment services is also discussed by Frank D. Tinari, Ph.D., in a subsection of chapter 6 of Gerald D. Martin's Determining Economic Damages, James Publishing Group, Santa Ana, CA, 2012, which states accompaniment does "not include consortium, intimate relations, love, and affection." Rather such accompaniment services "are more akin to those provided by a mere acquaintance" with whom one might "attend a movie, play cards, or take a stroll." Accompaniment does not require "any particular physical work activity or intimacy." Accompaniment is what can be provided by a hired home health aide or an "adult sitter."

The hourly value of the loss of accompaniment services is based on the mean hourly earnings of nursing assistants; home health

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aides and personal care aides; and childcare workers, which is \$14.46 per hour in year 2021 dollars. This wage data is based on information from the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, May 2021 National Occupational Employment and Wage Statistics found at www.bls.gov/oes.

I assess such services at their estimated market value which includes a conservative estimate of 50 percent hourly non-wage component reasonably charged by agencies or free-lance individual who supply such services on a part-time basis, and who are responsible for advertising, hiring and vetting, training, insuring and bonding the part-time service provider, and who are also responsible for pay-related costs such as the employer's share of social security contributions, etc. If a person were to hire a free-lance employee directly instead of going through an agency, then he or she would have to take on the responsibility for all the non-wage costs that the agency would otherwise incur and then charge for. The money the person would pay directly in wages would be only a portion of the total costs. The total costs would include those items discussed above that the agency would otherwise incur.

Adding the non-wage component to the hourly wage is consistent with labor market theory and competitive market behavior. Peer-reviewed economic research supports this theory and shows that the non-wage costs can average up to 300 percent for the wage. See, for example, Cushing, Matthew J. and David I. Rosenbaum, "Valuing Household Services: A New Look at the Replacement Cost Approach," Journal of Legal Economics, Vol 19, No. 1, 2012, pp. 37-60, wherein the authors say that there is a "divergence" between "market wage" rates paid to the employee and the "retail market" value of the services, amounting to 167 percent. The authors indicate a ratio of \$84.12 to \$31.54. This is more than triple the 50 percent non-wage costs amount I use, discussed above. Cushing and Rosenbaum also cite Smith, David A., Stan V. Smith, and Stephanie R. Uhl, "Estimating the Value of Family Household Management Services: Approaches and Markups," Forensic Rehabilitation & Economics, Vol 3, No. 2, 2010, pp. 85-94. According to this research, the statistical probability is 99 percent that the non-wage costs exceed 250 percent of the wage cost. The use of only a 50 percent non-wage cost makes my estimate very conservative, and it far more than compensates for variations in the national wage depending on locality. Thus even if the services are provided in low wage areas, my use of the low, 50 percent non-wage costs more than compensates for this factor.

According to Visiting Angels, a national companion care agency, charges for their services within the largest 100 Metropolitan Statistical Areas with populations of 500,000 and up range from \$17 to \$25 per hour, averaging \$21 per hour. This reflects non-

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wage costs of approximately 100 percent of wages, and is approximately double the non-wage costs figure that I use, resulting in an hourly rate of more than 25 percent higher than the rate that I use. Thus my use of only a 50 percent addition for non-wage costs is, in fact, very conservative.

Based on a benchmark loss of 2.5 hours per day for Edward Snukis, Jr. through his father's life expectancy; and at 0.5 hours per day for Samantha Snukis and Sierra Snukis through their father's life expectancy, my opinion of the loss of accompaniment as a result of the death of Edward Snukis is as follows:

\$520,904 ► Table 19 for Edward Snukis Jr.;
\$104,194 ► Table 22 for Samantha Snukis;
\$104,194 ► Table 25 for Sierra Snukis.

III. LOSS OF VALUE OF LIFE

Tables 26 through 28 show the loss of the value of life. Economists have long agreed that life is valued at more than the lost earnings capacity. My estimate of the value of life is based on many economic studies on what we, as a contemporary society, actually pay to preserve the ability to lead a normal life. The studies examine incremental pay for risky occupations as well as a multitude of data regarding expenditure for life savings by individuals, industry, and state and federal agencies. Based on the average value of a statistical life and life expectancy of 80.9 years, my opinion of the loss of the value of life for Edward Snukis is \$3,685,613 ► Table 28.

My estimate of the value of life is consistent with estimates published in other studies that examine and review the broad spectrum of economic literature on the value of life. Among these is "The Plausible Range for the Value of Life," Journal of Forensic Economics, Vol. 3, No. 3, Fall 1990, pp. 17-39, by T. R. Miller. This study reviews 67 different estimates of the value of life published by economists in peer-reviewed academic journals. The Miller results, in most instances, show the value of life to range from approximately \$1.6 million to \$2.9 million dollars in year 1988 after-tax dollars, with a mean of approximately \$2.2 million dollars. In "The Value of Life: Estimates with Risks by Occupation and Industry," Economic Inquiry, Vol. 42, No. 1, May 2003, pp. 29-48, Professor W. K. Viscusi estimates the value of life to be approximately \$4.7 million dollars in year 2000 dollars. An early seminal paper on the value of life was written by Richard Thaler and Sherwin Rosen, "The Value of Saving a Life: Evidence from the Labor Market." in N.E. Terlickyj (ed.), Household Production and Consumption. New York: Columbia University Press, 1975, pp. 265-300. The Meta-Analyses Appendix to this report reviews

additional literature suggesting a value of life of approximately \$5.4 million in year 2008 dollars.

Because it is generally accepted by economists, the economic methodology for the valuation of life has been found to meet the Daubert and Frye standards by many courts, along with the Rules of Evidence in many states nationwide. My testimony on the value of life has been accepted in over 275 state and federal cases nationwide in approximately two-thirds of the states and two-thirds of the federal jurisdictions. Testimony has been accepted by U.S. district and appellate courts as well as in state circuit, appellate, and supreme courts. Proof of general acceptance and other standards is found in a discussion of the extensive references to the scientific economic peer-reviewed literature on the value of life listed in the **Value of Life Appendix** to this report.

The underlying, academic, peer-reviewed studies fall into two general groups: (1) consumer behavior and purchases of safety devices; and (2) wage risk premiums to workers. I rely only on the peer-reviewed studies. One consumer safety study analyzes the costs of smoke detectors and the lifesaving reduction associated with them. One wage premium study examines the differential rates of pay for dangerous occupations with a risk of death on the job. Just as workers receive shift premiums for undesirable work hours, workers also receive a higher rate of pay to accept a increased risk of death on the job. There are also studies consisting of cost-benefit analyses of regulations. A cost-benefit study of government regulation examines the lifesaving resulting from the installation of smoke stack scrubbers at high-sulphur, coal-burning power plants. As a hypothetical example of the value of a statistical life (VSL) methodology, assume that a safety device such as a carbon monoxide detector costs \$46 and results in lowering a person's risk of premature death by one chance in 100,000. The cost per life saved is obtained by dividing \$46 by the one in 100,000 probability, yielding \$4,600,000. Overall, based on the peer-reviewed economic literature, I estimate the central tendency of the range of the economic studies to be approximately \$5.6 million in year 2022 dollars.

IV. LOSS OF SOCIETY OR RELATIONSHIP

Tables 29 through 37 show the loss of society or relationship sustained by Mr. Snukis's children. The value of the loss of society or relationship by family members with the injured can be based on a measure of the value of preserving the ability to live a normal life. This is discussed in the article, "The Relevance of Willingness-To-Pay Estimates of the Value of a Statistical Life in Determining Wrongful Death Awards," Journal of Forensic Economics, Vol. 3, No. 3, Fall 1990, pp. 75-89, by L. G. Chestnut

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and D. M. Violette. It is also discussed in "The Value of Life to Close Family Members: Calculating the Loss of Society and Companionship," The New Hedonics Primer for Economists and Attorneys, Second Edition, Edited by Thomas R. Ireland and John O. Ward, Lawyers & Judges Publishing Co., 1997, pp. 377-384, by Stan V. Smith, and republished in "The Value of Life to Close Family Members: Calculating the Loss of Society and Companionship," American Rehabilitation Economics Association 1997 Monograph, pp. 10-16.

It is standard forensic economic practice to conduct an informational interview to obtain information to assist in estimating economic losses, a practice recommended by National Association of Forensic Economics charter member Professor Gerald Martin, Ph.D. in his 2012 edition of Determining Economic Damages, Section 611, James Publishing Group, Santa Ana, CA. Dr. Martin recommended this approach stating that this assessment can provide the expert "a basis for his estimate." Subsequent editions have continued to recommend this approach. Dr. Martin's Determining Economic Damages has been a widely referenced textbook in the field of Forensic Economics.

Based on a benchmark loss of 50 percent for Edward Jr. and Samantha; and 40 percent for Sierra, my opinion of the loss of relationship as a result of the death of Edward Snukis is as follows:

\$3,085,623 ▶ Table 31 for Edward Snukis Jr.;
\$3,167,468 ▶ Table 34 for Samantha Snukis;
\$2,574,860 ▶ Table 37 for Sierra Snukis;

Other factors may be weighed to determine if these estimated losses for Edward Snukis should be adjusted because of special qualities or circumstances that economists do not as yet have a methodology for analysis.

In each set of tables, the estimated losses are calculated from September 13, 2019 through an assumed trial or resolution date of December 1, 2023, and from that date thereafter. The last table in each set accumulates the past and future estimated losses. These estimates are provided as a tool, an aid, and a guide to assist the evaluation by others.

All opinions expressed in this report are clearly labeled as such. They are rendered in accordance with generally accepted standards within the field of economics and are expressed to a reasonable degree of economic certainty. Estimates, assumptions, illustrations and the use of benchmarks, which are not opinions,

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but which can be viewed as hypothetical in nature, are also clearly disclosed and identified herein.

In my opinion, it is reasonable for experts in the field of economics and finance to rely on the materials and information I reviewed in this case for the formulation of my substantive opinions herein.

If additional information is provided to me, which could alter my opinions, I may incorporate any such information into an update, revision, addendum, or supplement of the opinions expressed in this report.

If you have any questions, please do not hesitate to call me.

Sincerely,



Stan V. Smith, Ph.D.
President

APPENDIX: HOUSEHOLD SERVICES VALUATION

Courts have long recognized claims for the value of tangible household family services as an element of damages in personal injury and wrongful death cases, as an aspect of the pecuniary loss in such cases. These services are those that are provided by the injured family member to himself or herself and to other family members, without charge or cost. Other family members who may receive such services can include spouses, children, parents or siblings; such family members do not necessarily have to reside in the same household to receive such services.

Economists and courts have also long recognized that an appropriate method in valuing such tangible services is to value their estimated market-based costs by examining costs paid in labor markets that provide generally comparable services for. Thus, economists can value the service by looking at market equivalents from which a pecuniary standard can be established. This approach is set forth in the 1913 U.S. Supreme Court Decision, Michigan Central Railroad Company v. Vreeland, 227 U.S. 59 (1913). So this method is a century old.

The Supreme Court's suggesting in valuing compensable services in the Vreeland decision is a standard that is not rigid, but actually rather general: "[The] pecuniary loss or damage must be one which can be measured by some standard.... Compensation for such loss manifestly does not include damages by way of recompense for grief or wounded feelings." Michigan Central v. Vreeland.

Examples of lost household services that used to be performed by persons (whether fatally or non-fatally injured) can include physical chores such as mowing the lawn, painting the house, cleaning the windows, doing the laundry, washing and repairing the car, preparing the meals and doing the dishes, among others. For many decades economists have met the Supreme Court's general standard by using labor market equivalents for cooks, laundry workers, gardeners, maids, etc. in valuing the physical chores regarding housekeeping services.

Additionally, economists have recognized that tangible services to family members include services well beyond the physical housekeeping chores. Services performed by family members includes much, much more than the physical housekeeping chores. Frank D. Tinari, in a peer-reviewed, scientific, economic journal article "Household Services: Toward a More Comprehensive Measure," Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, pp. 253-265, also asserts this. Dr. Tinari has been a tenured Professor at Seton Hall University, and is a former president of the National Association of Forensic Economics. There has been no peer-reviewed critique of this article since it appeared.

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Family members typically provide services that can be provided by people in many other professions such as that of a chauffeur, driving other family members to appointments, or that of a security guard, especially regarding the injury to a male spouse, etc. Every family member acts as a companion to other family members. And it is common for family members to act as counselors for one another, typically providing advice and counsel on important personal, family, medical, financial, career or other issues. The marketplace can and does value such items of loss. If the person cannot provide these services, or does so at a reduced capacity or rate, there is a distinct and definite loss to the other family members. These losses have a definite and easily measurable pecuniary value. Vreeland requires only that a "reasonable expectation" of loss of services be proven and that such loss be valued by some standard, presumably a reasonably-based economic standard, to allow recovery.

The economic literature on recovery of loss of services discusses an estimated market-oriented valuation cost method to assess the pecuniary value of the loss of accompaniment services, as well as the value of advice, guidance and counsel services that family members provide to one another, within a broadly defined scope of family services. See, for example, Frank D. Tinari, "Household Services: Toward a More Comprehensive Measure, " Journal of Forensic Economics, Vol. 11, No. 3, Fall 1998, pp. 253-265.

Finally, according to Chief Justice Robert Wilentz of the Supreme Court of New Jersey, in Green v. Bittner, 85 NJ 1, 1980, pp. 12, accompaniment services, to be compensable, must be that which would have provided services substantially equivalent to those provided by the companions often hired today by the aged or infirm, or substantially equivalent to services provided by nurses or practical nurses; and its value must be confined to what the marketplace would pay a stranger with similar qualifications for performing such services.

In valuing the household services that are provided by family members to one another, beyond the physical housekeeping chores, both the U.S Supreme Court and the New Jersey Supreme Court discuss looking at labor markets for the equivalent value of such services. This methodology is identical to the traditional approach that economists have been using for over four decades in valuing the physical chores involved in housekeeping services.

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APPENDIX: VALUE OF LIFE

The economic methodology for the valuation of life has been found to meet the Daubert and Frye standards by many courts, along with the Rules of Evidence in many states nationwide. My testimony on the value of life has been accepted in over 275 state and federal cases nationwide in approximately two-thirds of the states and two-thirds of the federal jurisdictions. Testimony has been accepted by U.S. district and appellate courts as well as in state circuit, appellate, and supreme courts. The Daubert standard sets forth four criteria:

1. Testing of the theory and science
2. Peer Review
3. Known or potential rate of error
4. Generally accepted.

Testing of the theory and science has been accomplished over the past four decades, since the 1960s. Dozens of economists of high renown have published over a hundred articles in high quality, peer-reviewed economic journals measuring the value of life. The value of life theories are perhaps among the most well-tested in the field of economics, as evidenced by the enormous body of economic scientific literature that has been published in the field and is discussed below.

Peer Review of the concepts and methodology have been extraordinarily extensive. One excellent review of this extensive, peer-reviewed literature can be found in "The Value of Risks to Life and Health," W. K. Viscusi, Journal of Economic Literature, Vol. 31, December 1993, pp. 1912-1946. A second is "The Value of a Statistical Life: A Critical Review of Market Estimates throughout the World." W. K. Viscusi and J. E. Aldy, Journal of Risk and Uncertainty, Vol. 27, No. 1, November 2002, pp. 5-76. Additional theoretical and empirical work by Viscusi, a leading researcher in the field, can be found in: "The Value of Life", W. K. Viscusi, John M. Olin Center for Law, Economics, and Business, Harvard Law School, Discussion Paper No. 517, June 2005. An additional peer-reviewed article discusses the application to forensic economics: "The Plausible Range for the Value of Life," T. R. Miller, Journal of Forensic Economics, Vol. 3, No. 3, Fall 1990, pp. 17-39, which discusses the many dozens of articles published in other peer-reviewed economic journals on this topic. This concept is discussed in detail in "Willingness to Pay Comes of Age: Will the System Survive?" T. R. Miller, Northwestern University Law Review, Summer 1989, pp. 876-907, and "Hedonic Damages in Personal Injury and Wrongful Death

Litigation," by Stan V. Smith in Gaughan and Thornton, eds., Litigation Economics, Contemporary Studies in Economic and Financial Analysis, Vol. 74, pp. 39-59, JAI Press, Greenwich, CT, 1993. Kenneth Arrow, a Nobel Laureate in economics, discusses this method for valuing life in "Invaluable Goods," Journal of Economic Literature, Vol. 35, No. 2, 1997, pp. 759. See the Meta-Analyses Appendix for an additional review of the literature.

The known or potential rate of error is well researched. All of these articles discuss the known or potential rate of error, well within the acceptable standard in the field of economics, generally using a 95% confidence rate for the statistical testing and acceptance of results. There are few areas in the field of economics where the known or potential rate of error has been as well-accepted and subject to more extensive investigation.

General Acceptance of the concepts and methodology on the value of life in the field of economics is extensive. This methodology is and has been generally accepted in the field of economics for many years. Indeed, according to the prestigious and highly-regarded research institute, The Rand Corporation, by 1988, the peer-reviewed scientific methods for estimating the value of life were well-accepted: "Most economists would agree that the willingness-to-pay methodology is the most conceptually appropriate criterion for establishing the value of life," Computing Economic loss in Cases of Wrongful Death, King and Smith, Rand Institute for Civil Justice, R-3549-ICJ, 1988.

While first discussed in cutting edge, peer-reviewed economic journals, additional proof of general acceptance is now indicated by the fact that this methodology is now taught in standard economics courses at the undergraduate and graduate level throughout hundreds of colleges and universities nationwide as well as the fact that it is taught and discussed in widely-accepted textbooks in the field of law and economics: Economics, Sixth Edition, David C. Colander, McGraw-Hill Irwin, Boston, 2006, pp. 463-465; this introductory economics textbook is the third most widely used textbook in college courses nationwide. Hamermesh and Rees's The Economics of Work and Pay, Harper-Collins, 1993, Chapter 13, a standard advanced textbook in labor economics, also discusses the methodology for valuing life. Other textbooks discuss this topic as well. Richard Posner, a Judge and former Chief Judge of the U.S. Court of Appeals for the highly regarded 7th Circuit and Senior Lecturer at the University of Chicago Law School, one of most prolific legal writers in America, details the Value of Life approach in his widely used textbooks: Economic Analysis of Law, 1986, Little Brown & Co., pp. 182-185 and Tort Law, 1982, Little Brown & Co., pp. 120-126.

As further evidence of general acceptance in the field, some surveys (albeit non-scientific) published in the field of

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forensic economics show that hundreds of economists nationwide are now familiar with this methodology and are available to prepare (and critique) forensic economic value of life estimates. Indeed, some economists who indicate they will prepare such analysis for plaintiffs also are willing to critique such analysis for defendants, as I have done. That an economist is willing to critique a report does not indicate that he or she is opposed to the concept or the methodology, but merely available to assure that the plaintiff economist has employed proper techniques. The fact that there are economists who indicate they do not prepare estimates of value of life is again no indication that they oppose the methodology: many claim they are not familiar with the literature and untrained in this area. While some CPAs and others without a degree in economics have opposed these methods, such professionals do not have the requisite academic training and are unqualified to make such judgements. However, as in any field of economics, this area is not without any dissent. General acceptance does not mean universal acceptance.

Additional evidence of general acceptance in the field is found in the teaching of the concepts regarding the value of life. Forensic Economics is now taught as a special field in a number of institutions nationwide. I taught what is believed to be the first course ever presented in the field of Forensic Economics at DePaul University in Spring, 1990. My own book, Economic/Hedonic Damages, Anderson, 1990, and supplemental updates thereto, co-authored with Dr. Michael Brookshire, a Professor of Economics in West Virginia, has been used as a textbook in at least 5 colleges and universities nationwide in such courses in economics, and has a thorough discussion of the methodology. Toppino et. al., in "Forensic Economics in the Classroom," published in The Earnings Analyst, Journal of the American Rehabilitation Economics Association, Vol. 4, 2001, pp. 53-86, indicate that hedonic damages is one of 15 major topic areas taught in such courses.

Lastly, general acceptance is found by examining publications in the primary journal in the field of Forensic Economics, which is the peer-reviewed Journal of Forensic Economics, where there have been published many articles on the value of life. Some are cited above. Others include: "The Econometric Basis for Estimates of the Value of Life," W. K. Viscusi, Vol 3, No. 3, Fall 1990, pp. 61-70; "Hedonic Damages in the Courtroom Setting." Stan V. Smith, Vol. 3, No. 3, Fall 1990, pp. 41-49; "Issues Affecting the Calculated Value of Life," E. P. Berla, M. L. Brookshire and Stan V. Smith, Vol 3, No. 1, 1990, pp. 1-8; "Hedonic Damages and Personal Injury: A Conceptual Approach." G. R. Albrecht, Vol. 5., No. 2, Spring/Summer 1992, pp. 97-104; "The Application of the Hedonic Damages Concept to Wrongful and Personal Injury Litigation." G. R. Albrecht, Vol. 7, No. 2, Spring/Summer 1994, pp. 143-150; and also "A Review of the Monte Carlo Evidence Concerning Hedonic Value of Life Estimates," R. F.

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Gilbert, Vol. 8, No. 2, Spring/Summer 1995, pp. 125-130. Professor Ike Mathur, while Chairman of the Department of Finance at Southern Illinois University wrote an article on how the value of life studies can be used to provide a basis for estimating the value of life per year in application to litigation. This article corroborates my approach: "Estimating Value of Life per Life Year." I. Mathur, Journal of Forensic Economics, Vol. 3, No. 3, 1990, pp. 95-96. As do many of the authors of applications of the value of life literature to litigation economics, Professor Mathur has frequently testified in court, and courts have admitted his testimony.

It is important to note that this methodology is endorsed and employed by the U. S. Government as the standard and recommended approach for use by all U. S. Agencies in valuing life for policy purposes, as mandated in current and past Presidential Executive Orders in effect since 1972, and as discussed in "Report to Congress on the Costs and Benefits of Federal Regulations," Office of Management and Budget, 1998, and "Economic Analysis of Federal Regulations Under Executive Order 12866," Executive Office of the President, Office of Management and Budget, pp. 1-37, and "Report to the President on Executive Order No. 12866," Regulatory Planning and Review, May 1, 1994, Office of Information and Regulatory Affairs, Office of Management and Budget. Prior presidents signed similar orders as discussed in "Federal Agency Valuations of Human life," Administrative Conference of the United States, Report for Recommendation 88-7, December 1988, pp. 368-408. 926

APPENDIX: META-ANALYSES AND VALUE OF LIFE RESULTS SINCE 2000

Below I list the principal systematic reviews (meta-analyses), since the year 2000, of the value of life literature, and the values of a statistical life that they recommend. In statistics, a meta-analysis combines the results of several studies that address a set of related research hypotheses. Meta-analysis increase the statistical power of studies by analyzing a group of studies and provide a more powerful and accurate data analysis than would result from analyzing each study alone. Based on those reviews, the Summary Table suggests a best estimate. The following table summarizes the studies and their findings.

These statistically based studies place the value between \$4.4 and \$7.5 million, with \$5.9 million in year 2005 dollars representing a conservative yet credible estimate of the average (and range midpoint) of the values of a statistical life published in the studies in year 2005 dollars. Net of human capital, a credible net value of life based on all these literature reviews to be \$4.8 million in year 2005 dollars, or \$5.4 million in year 2008 dollars.

The actual value that I use, \$4.1 million in year 2008 dollars (\$5.6 million in year 2022 dollars) is approximately 24 percent lower than a conservative average estimate based on the credible meta-analyses. This value was originally based on a review conducted in the late 1980s, averaging the results published by that time. I have increased that late 1980s value only by inflation over time, despite the fact a review of literature over the years since that time has put obvious upward pressure on the figure that I use.

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VALUE OF STATISTICAL LIFE SUMMARY TABLE

Mean and range of value of statistical life estimates (in 2005 dollars) from the best meta-analyses and systematic reviews since 2000 and characteristics of those reviews.

Study	Formal Meta-Analysis?	Number of Values	Best Estimate (2005 Dollars)	Range	Context
Miller 2000	Yes	68 estimates	\$5.1M	\$4.5-\$6.2M	US estimate from all
Mrozek & Taylor 2002	Yes	203 estimates	\$4.4M	+ or - 35%	Labor market
Viscusi & Aldy 2003	Yes	49 estimates	\$6.5M	\$5.1-\$9.6M	Labor market, US estimate from all
Kochi et al. 2006	Yes	234 estimates	\$6.0M	+ or - 44%	Labor market survey
Bellavance 2006 (published in 2009)	Yes	37 estimates	\$7.5M	+ or - 19%	Labor market

Adapted from Ted R. Miller's paper "Hedonic Damages," Journal of Forensic Economics, Vol. 20, No. 2 (October 2008), pp. 137-153.

Miller (2000) started from the Miller 1989 JFE estimates and used statistical methods to adjust for differences between studies. It also added newer studies, primarily ones outside the United States. The authors specified the most appropriate study approach a priori, which allowed calculation of a best estimate from the statistical regression. Miller, Ted R, "Variations between Countries in Values of Statistical Life", Journal of Transport Economics and Policy, Vol. 34, No. 2 (May 2000), pp. 169-188.

Mrozek and Taylor (2002) searched intensively for studies of the value of life implied by wages paid for risky jobs. They coded all values from each study rather than a most appropriate estimate. A statistical analysis identified what factors accounted for the differences in values between studies. The authors specified the most appropriate study approach a priori, which allowed calculation of a best estimate from the statistical regression. Mrozek, Janusz R. and Laura O. Taylor, "What Determines the Value of Life? A Meta-Analysis", Journal of Policy Analysis and Management, Vol. 21, No. 2 (2002), pp. 253-270.

Viscusi and Aldy (2003) focused on values from labor market studies that they considered of high quality and that provided data on risk levels and other important explanatory variables. They used statistical methods to account for variations between studies and derive a best estimate. W.K. Viscusi and J.E. Aldy, "The Value of a Statistical Life: A Critical Review of Market Estimates Throughout the World", Journal of Risk and Uncertainty, Vol. 27, No. 1 (2003), pp. 5-76.

Kochi et al. (2006) searched intensively for studies of the value of life implied by wages and coded all values from each study rather than a most appropriate estimate. They did not filter study quality carefully. The best estimate was derived by statistical methods based on the distribution of the values within and across studies. Kochi, Ikuho, Bryan Hubbell, and Randall Kramer, "An Empirical Bayes Approach to Combining and Comparing Estimates of the Value of a Statistical Life for Environmental Policy Analysis", Environmental and Resource Economics, Vol. 34 (2006), pp. 385-406.

Bellavance et al. (2009) focused on values from labor market studies that they considered of high quality and that provided data on risk levels and other important explanatory variables. They used statistical methods to account for variations between studies and derive a best estimate. Bellavance, Francois, Georges Dionne, and Martin Lebeau, "The Value of a Statistical Life: A Meta-Analysis with a Mixed Effects Regression Model," Journal of Health Economics, Vol. 28, Issue 2, (2009), pp. 444-464. 3A22

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SUMMARY OF LOSSES FOR EDWARD SNUKIS, SR.

TABLE	DESCRIPTION	ESTIMATE
*****	*****	*****
	<u>EARNINGS</u>	
	LOSS OF WAGES & BENEFITS, NET OF PERSONAL CONSUMPTION	
7	Annual Employment to age 67	\$ 441,450

	<u>HOUSEHOLD/FAMILY SERVICES</u>	
	LOSS OF HOUSEHOLD/FAMILY GUIDANCE SERVICES	
10	Edward Snukis Jr.	\$ 435,631
13	Samantha Snukis	\$ 217,807
16	Sierra Snukis	\$ 217,807
	LOSS OF HOUSEHOLD/FAMILY ACCOMPANIMENT SERVICES	
19	Edward Snukis Jr.	\$ 520,904
22	Samantha Snukis	\$ 104,194
25	Sierra Snukis	\$ 104,194

	<u>LOSS OF ENJOYMENT OF LIFE</u>	
28	LOSS OF VALUE OF LIFE	\$3,685,613

	<u>LOSS OF SOCIETY AND RELATIONSHIP</u>	
	LOSS OF RELATIONSHIP	
31	Edward Snukis Jr.	\$3,085,623
34	Samantha Snukis	\$3,167,468
37	Sierra Snukis	\$2,574,860

The information on this Summary of Losses is intended to summarize losses under certain given assumptions. Please refer to the report and the tables for all the conditions.

Table 1

LOSS OF PAST WAGES
2019 - 2023

YEAR	AGE	WAGES	CUMULATE
****	***	*****	*****
2019	56	\$24,772	\$24,772
2020	57	86,133	110,905
2021	58	93,410	204,315
2022	59	99,015	303,330
2023	60	93,323	\$396,653
SNUKIS		\$396,653	

Table 2

LOSS OF PAST PERSONAL CONSUMPTION
2019 - 2023

YEAR	AGE	PERSONAL CONSUMPTION	CUMULATE
****	***	*****	*****
2019	56	-\$15,631	-\$15,631
2020	57	-53,532	-69,163
2021	58	-56,093	-125,256
2022	59	-59,459	-184,715
2023	60	-56,041	-\$240,756
SNUKIS		-\$240,756	

Table 3

ECONOMIC LOSS TO DATE
2019 - 2023

YEAR	AGE	WAGES	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****
2019	56	\$24,772	-\$15,631	\$9,141	\$9,141
2020	57	86,133	-53,532	32,601	41,742
2021	58	93,410	-56,093	37,317	79,059
2022	59	99,015	-59,459	39,556	118,615
2023	60	93,323	-56,041	37,282	\$155,897
SNUKIS		\$396,653	-\$240,756	\$155,897	

Table 4

PRESENT VALUE OF FUTURE WAGES
2023 - 2044

YEAR	AGE	WAGES	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	60	\$8,662	0.99894	\$8,653	\$8,653
2024	61	103,005	0.98661	101,626	110,279
2025	62	104,035	0.97443	101,375	211,654
2026	63	105,075	0.96240	101,124	312,778
2027	64	106,126	0.95052	100,875	413,653
2028	65	107,187	0.93878	100,625	514,278
2029	66	108,259	0.92719	100,377	614,655
2030	67	109,342	0.91574	100,129	714,784
2031	68	110,435	0.90444	99,882	814,666
2032	69	111,539	0.89327	99,634	914,300
2033	70	112,654	0.88224	99,388	1,013,688
2034	71	113,781	0.87135	99,143	1,112,831
2035	72	114,919	0.86059	98,898	1,211,729
2036	73	116,068	0.84997	98,654	1,310,383
2037	74	117,229	0.83948	98,411	1,408,794
2038	75	118,401	0.82911	98,167	1,506,961
2039	76	119,585	0.81888	97,926	1,604,887
2040	77	120,781	0.80877	97,684	1,702,571
2041	78	121,989	0.79878	97,442	1,800,013
2042	79	123,209	0.78892	97,202	1,897,215
2043	80	124,441	0.77918	96,962	1,994,177
2044	81	86,086	0.77257	66,507	\$2,060,684
EDWARD SNUKIS				\$2,060,684	

Table 5

PRESENT VALUE OF FUTURE PERSONAL CONSUMPTION
2023 - 2044

YEAR	AGE	PERSONAL CONSUMPTION	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	60	-\$5,201	0.99894	-\$5,196	-\$5,196
2024	61	-61,855	0.98661	-61,027	-66,223
2025	62	-62,473	0.97443	-60,876	-127,099
2026	63	-63,098	0.96240	-60,726	-187,825
2027	64	-63,729	0.95052	-60,576	-248,401
2028	65	-64,366	0.93878	-60,426	-308,827
2029	66	-65,010	0.92719	-60,277	-369,104
2030	67	-65,660	0.91574	-60,127	-429,231
2031	68	-66,316	0.90444	-59,979	-489,210
2032	69	-66,979	0.89327	-59,830	-549,040
2033	70	-67,649	0.88224	-59,683	-608,723
2034	71	-68,325	0.87135	-59,535	-668,258
2035	72	-69,009	0.86059	-59,388	-727,646
2036	73	-69,699	0.84997	-59,242	-786,888
2037	74	-70,396	0.83948	-59,096	-845,984
2038	75	-71,100	0.82911	-58,950	-904,934
2039	76	-71,811	0.81888	-58,805	-963,739
2040	77	-72,529	0.80877	-58,659	-1,022,398
2041	78	-73,254	0.79878	-58,514	-1,080,912
2042	79	-73,987	0.78892	-58,370	-1,139,282
2043	80	-74,727	0.77918	-58,226	-1,197,508
2044	81	-51,695	0.77257	-39,938	-\$1,237,446
EDWARD SNUKIS				-\$1,237,446	

Table 6

PRESENT VALUE OF FUTURE WAGES AND PERSONAL CONSUMPTION
2023 - 2044

YEAR	AGE	WAGES	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****
2023	60	\$8,653	-\$5,196	\$3,457	\$3,457
2024	61	101,626	-61,027	40,599	44,056
2025	62	101,375	-60,876	40,499	84,555
2026	63	101,124	-60,726	40,398	124,953
2027	64	100,875	-60,576	40,299	165,252
2028	65	100,625	-60,426	40,199	205,451
2029	66	100,377	-60,277	40,100	245,551
2030	67	100,129	-60,127	40,002	285,553
2031	68	99,882	-59,979	39,903	325,456
2032	69	99,634	-59,830	39,804	365,260
2033	70	99,388	-59,683	39,705	404,965
2034	71	99,143	-59,535	39,608	444,573
2035	72	98,898	-59,388	39,510	484,083
2036	73	98,654	-59,242	39,412	523,495
2037	74	98,411	-59,096	39,315	562,810
2038	75	98,167	-58,950	39,217	602,027
2039	76	97,926	-58,805	39,121	641,148
2040	77	97,684	-58,659	39,025	680,173
2041	78	97,442	-58,514	38,928	719,101
2042	79	97,202	-58,370	38,832	757,933
2043	80	96,962	-58,226	38,736	796,669
2044	81	66,507	-39,938	26,569	\$823,238
SNUKIS		\$2,060,684	-\$1,237,446	\$823,238	

Table 7

PRESENT VALUE OF NET WAGES AND PERSONAL CONSUMPTION
2019 - 2044

YEAR	AGE	WAGES	PERSONAL CONSUMPTION	TOTAL	CUMULATE
****	***	*****	*****	*****	*****
2019	56	\$24,772	-\$15,631	\$9,141	\$9,141
2020	57	86,133	-53,532	32,601	41,742
2021	58	93,410	-56,093	37,317	79,059
2022	59	99,015	-59,459	39,556	118,615
2023	60	101,976	-61,237	40,739	159,354
2024	61	101,626	-61,027	40,599	199,953
2025	62	101,375	-60,876	40,499	240,452
2026	63	101,124	-60,726	40,398	280,850
2027	64	100,875	-60,576	40,299	321,149
2028	65	100,625	-60,426	40,199	361,348
2029	66	100,377	-60,277	40,100	401,448
2030	67	100,129	-60,127	40,002	441,450
2031	68	99,882	-59,979	39,903	481,353
2032	69	99,634	-59,830	39,804	521,157
2033	70	99,388	-59,683	39,705	560,862
2034	71	99,143	-59,535	39,608	600,470
2035	72	98,898	-59,388	39,510	639,980
2036	73	98,654	-59,242	39,412	679,392
2037	74	98,411	-59,096	39,315	718,707
2038	75	98,167	-58,950	39,217	757,924
2039	76	97,926	-58,805	39,121	797,045
2040	77	97,684	-58,659	39,025	836,070
2041	78	97,442	-58,514	38,928	874,998
2042	79	97,202	-58,370	38,832	913,830
2043	80	96,962	-58,226	38,736	952,566
2044	81	66,507	-39,938	26,569	\$979,135
SNUKIS		\$2,457,337	-\$1,478,202	\$979,135	

Table 8

LOSS OF PAST GUIDANCE TO EDWARD
2019 - 2023

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	31	\$4,307	\$4,307
2020	32	15,641	19,948
2021	33	16,547	36,495
2022	34	17,540	54,035
2023	35	16,532	\$70,567
EDWARD SNUKIS JR.			\$70,567

Table 9

PRESENT VALUE OF FUTURE GUIDANCE TO EDWARD
2023 - 2044

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	35	\$1,534	0.99894	\$1,533	\$1,533
2024	36	18,247	0.98661	18,003	19,536
2025	37	18,429	0.97443	17,958	37,494
2026	38	18,613	0.96240	17,913	55,407
2027	39	18,799	0.95052	17,869	73,276
2028	40	18,987	0.93878	17,825	91,101
2029	41	19,177	0.92719	17,781	108,882
2030	42	19,369	0.91574	17,737	126,619
2031	43	19,563	0.90444	17,694	144,313
2032	44	19,759	0.89327	17,650	161,963
2033	45	19,957	0.88224	17,607	179,570
2034	46	20,157	0.87135	17,564	197,134
2035	47	20,359	0.86059	17,521	214,655
2036	48	20,563	0.84997	17,478	232,133
2037	49	20,769	0.83948	17,435	249,568
2038	50	20,977	0.82911	17,392	266,960
2039	51	21,187	0.81888	17,350	284,310
2040	52	21,399	0.80877	17,307	301,617
2041	53	21,613	0.79878	17,264	318,881
2042	54	21,829	0.78892	17,221	336,102
2043	55	22,047	0.77918	17,179	353,281
2044	56	15,252	0.77257	11,783	\$365,064
EDWARD SNUKIS JR.					\$365,064

Table 10

PRESENT VALUE OF NET GUIDANCE TO EDWARD
2019 - 2044

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	31	\$4,307	\$4,307
2020	32	15,641	19,948
2021	33	16,547	36,495
2022	34	17,540	54,035
2023	35	18,065	72,100
2024	36	18,003	90,103
2025	37	17,958	108,061
2026	38	17,913	125,974
2027	39	17,869	143,843
2028	40	17,825	161,668
2029	41	17,781	179,449
2030	42	17,737	197,186
2031	43	17,694	214,880
2032	44	17,650	232,530
2033	45	17,607	250,137
2034	46	17,564	267,701
2035	47	17,521	285,222
2036	48	17,478	302,700
2037	49	17,435	320,135
2038	50	17,392	337,527
2039	51	17,350	354,877
2040	52	17,307	372,184
2041	53	17,264	389,448
2042	54	17,221	406,669
2043	55	17,179	423,848
2044	56	11,783	\$435,631
EDWARD SNUKIS JR.			\$435,631

Table 11

LOSS OF PAST GUIDANCE TO SAMANTHA
2019 - 2023

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	33	\$2,154	\$2,154
2020	34	7,821	9,975
2021	35	8,274	18,249
2022	36	8,770	27,019
2023	37	8,266	\$35,285
SNUKIS		\$35,285	

Table 12

PRESENT VALUE OF FUTURE GUIDANCE TO SAMANTHA
2023 - 2044

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	37	\$767	0.99894	\$766	\$766
2024	38	9,123	0.98661	9,001	9,767
2025	39	9,214	0.97443	8,978	18,745
2026	40	9,306	0.96240	8,956	27,701
2027	41	9,399	0.95052	8,934	36,635
2028	42	9,493	0.93878	8,912	45,547
2029	43	9,588	0.92719	8,890	54,437
2030	44	9,684	0.91574	8,868	63,305
2031	45	9,781	0.90444	8,846	72,151
2032	46	9,879	0.89327	8,825	80,976
2033	47	9,978	0.88224	8,803	89,779
2034	48	10,078	0.87135	8,781	98,560
2035	49	10,179	0.86059	8,760	107,320
2036	50	10,281	0.84997	8,739	116,059
2037	51	10,384	0.83948	8,717	124,776
2038	52	10,488	0.82911	8,696	133,472
2039	53	10,593	0.81888	8,674	142,146
2040	54	10,699	0.80877	8,653	150,799
2041	55	10,806	0.79878	8,632	159,431
2042	56	10,914	0.78892	8,610	168,041
2043	57	11,023	0.77918	8,589	176,630
2044	58	7,626	0.77257	5,892	\$182,522
SAMANTHA SNUKIS				\$182,522	

Table 13

PRESENT VALUE OF NET GUIDANCE TO SAMANTHA
2019 - 2044

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	33	\$2,154	\$2,154
2020	34	7,821	9,975
2021	35	8,274	18,249
2022	36	8,770	27,019
2023	37	9,032	36,051
2024	38	9,001	45,052
2025	39	8,978	54,030
2026	40	8,956	62,986
2027	41	8,934	71,920
2028	42	8,912	80,832
2029	43	8,890	89,722
2030	44	8,868	98,590
2031	45	8,846	107,436
2032	46	8,825	116,261
2033	47	8,803	125,064
2034	48	8,781	133,845
2035	49	8,760	142,605
2036	50	8,739	151,344
2037	51	8,717	160,061
2038	52	8,696	168,757
2039	53	8,674	177,431
2040	54	8,653	186,084
2041	55	8,632	194,716
2042	56	8,610	203,326
2043	57	8,589	211,915
2044	58	5,892	\$217,807
SNUKIS		\$217,807	

Table 14

LOSS OF PAST GUIDANCE TO SIERRA
2019 - 2023

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	32	\$2,154	\$2,154
2020	33	7,821	9,975
2021	34	8,274	18,249
2022	35	8,770	27,019
2023	36	8,266	\$35,285
SNUKIS		\$35,285	

Table 15

PRESENT VALUE OF FUTURE GUIDANCE TO SIERRA
2023 - 2044

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	36	\$767	0.99894	\$766	\$766
2024	37	9,123	0.98661	9,001	9,767
2025	38	9,214	0.97443	8,978	18,745
2026	39	9,306	0.96240	8,956	27,701
2027	40	9,399	0.95052	8,934	36,635
2028	41	9,493	0.93878	8,912	45,547
2029	42	9,588	0.92719	8,890	54,437
2030	43	9,684	0.91574	8,868	63,305
2031	44	9,781	0.90444	8,846	72,151
2032	45	9,879	0.89327	8,825	80,976
2033	46	9,978	0.88224	8,803	89,779
2034	47	10,078	0.87135	8,781	98,560
2035	48	10,179	0.86059	8,760	107,320
2036	49	10,281	0.84997	8,739	116,059
2037	50	10,384	0.83948	8,717	124,776
2038	51	10,488	0.82911	8,696	133,472
2039	52	10,593	0.81888	8,674	142,146
2040	53	10,699	0.80877	8,653	150,799
2041	54	10,806	0.79878	8,632	159,431
2042	55	10,914	0.78892	8,610	168,041
2043	56	11,023	0.77918	8,589	176,630
2044	57	7,626	0.77257	5,892	\$182,522
SIERRA SNUKIS				\$182,522	

Table 16

PRESENT VALUE OF NET GUIDANCE TO SIERRA
2019 - 2044

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	32	\$2,154	\$2,154
2020	33	7,821	9,975
2021	34	8,274	18,249
2022	35	8,770	27,019
2023	36	9,032	36,051
2024	37	9,001	45,052
2025	38	8,978	54,030
2026	39	8,956	62,986
2027	40	8,934	71,920
2028	41	8,912	80,832
2029	42	8,890	89,722
2030	43	8,868	98,590
2031	44	8,846	107,436
2032	45	8,825	116,261
2033	46	8,803	125,064
2034	47	8,781	133,845
2035	48	8,760	142,605
2036	49	8,739	151,344
2037	50	8,717	160,061
2038	51	8,696	168,757
2039	52	8,674	177,431
2040	53	8,653	186,084
2041	54	8,632	194,716
2042	55	8,610	203,326
2043	56	8,589	211,915
2044	57	5,892	\$217,807
SNUKIS		\$217,807	

Table 17

LOSS OF PAST ACCOMPANIMENT TO EDWARD
2019 - 2023

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	31	\$5,150	\$5,150
2020	32	18,704	23,854
2021	33	19,788	43,642
2022	34	20,975	64,617
2023	35	19,769	\$84,386
EDWARD SNUKIS JR.			\$84,386

Table 18

PRESENT VALUE OF FUTURE ACCOMPANIMENT TO EDWARD
2023 - 2044

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	35	\$1,835	0.99894	\$1,833	\$1,833
2024	36	21,820	0.98661	21,528	23,361
2025	37	22,038	0.97443	21,474	44,835
2026	38	22,258	0.96240	21,421	66,256
2027	39	22,481	0.95052	21,369	87,625
2028	40	22,706	0.93878	21,316	108,941
2029	41	22,933	0.92719	21,263	130,204
2030	42	23,162	0.91574	21,210	151,414
2031	43	23,394	0.90444	21,158	172,572
2032	44	23,628	0.89327	21,106	193,678
2033	45	23,864	0.88224	21,054	214,732
2034	46	24,103	0.87135	21,002	235,734
2035	47	24,344	0.86059	20,950	256,684
2036	48	24,587	0.84997	20,898	277,582
2037	49	24,833	0.83948	20,847	298,429
2038	50	25,081	0.82911	20,795	319,224
2039	51	25,332	0.81888	20,744	339,968
2040	52	25,585	0.80877	20,692	360,660
2041	53	25,841	0.79878	20,641	381,301
2042	54	26,099	0.78892	20,590	401,891
2043	55	26,360	0.77918	20,539	422,430
2044	56	18,235	0.77257	14,088	\$436,518
EDWARD SNUKIS JR.					\$436,518

Table 19

PRESENT VALUE OF NET ACCOMPANIMENT TO EDWARD
2019 - 2044

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	31	\$5,150	\$5,150
2020	32	18,704	23,854
2021	33	19,788	43,642
2022	34	20,975	64,617
2023	35	21,602	86,219
2024	36	21,528	107,747
2025	37	21,474	129,221
2026	38	21,421	150,642
2027	39	21,369	172,011
2028	40	21,316	193,327
2029	41	21,263	214,590
2030	42	21,210	235,800
2031	43	21,158	256,958
2032	44	21,106	278,064
2033	45	21,054	299,118
2034	46	21,002	320,120
2035	47	20,950	341,070
2036	48	20,898	361,968
2037	49	20,847	382,815
2038	50	20,795	403,610
2039	51	20,744	424,354
2040	52	20,692	445,046
2041	53	20,641	465,687
2042	54	20,590	486,277
2043	55	20,539	506,816
2044	56	14,088	\$520,904
EDWARD SNUKIS JR.			\$520,904

Table 20

LOSS OF PAST ACCOMPANIMENT TO SAMANTHA
2019 - 2023

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	33	\$1,030	\$1,030
2020	34	3,741	4,771
2021	35	3,958	8,729
2022	36	4,195	12,924
2023	37	3,954	\$16,878
SNUKIS		\$16,878	

Table 21

PRESENT VALUE OF FUTURE ACCOMPANIMENT TO SAMANTHA
2023 - 2044

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	37	\$367	0.99894	\$367	\$367
2024	38	4,364	0.98661	4,306	4,673
2025	39	4,408	0.97443	4,295	8,968
2026	40	4,452	0.96240	4,285	13,253
2027	41	4,497	0.95052	4,274	17,527
2028	42	4,542	0.93878	4,264	21,791
2029	43	4,587	0.92719	4,253	26,044
2030	44	4,633	0.91574	4,243	30,287
2031	45	4,679	0.90444	4,232	34,519
2032	46	4,726	0.89327	4,222	38,741
2033	47	4,773	0.88224	4,211	42,952
2034	48	4,821	0.87135	4,201	47,153
2035	49	4,869	0.86059	4,190	51,343
2036	50	4,918	0.84997	4,180	55,523
2037	51	4,967	0.83948	4,170	59,693
2038	52	5,017	0.82911	4,160	63,853
2039	53	5,067	0.81888	4,149	68,002
2040	54	5,118	0.80877	4,139	72,141
2041	55	5,169	0.79878	4,129	76,270
2042	56	5,221	0.78892	4,119	80,389
2043	57	5,273	0.77918	4,109	84,498
2044	58	3,648	0.77257	2,818	\$87,316
SAMANTHA SNUKIS				\$87,316	

Table 22

PRESENT VALUE OF NET ACCOMPANIMENT TO SAMANTHA
2019 - 2044

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	33	\$1,030	\$1,030
2020	34	3,741	4,771
2021	35	3,958	8,729
2022	36	4,195	12,924
2023	37	4,321	17,245
2024	38	4,306	21,551
2025	39	4,295	25,846
2026	40	4,285	30,131
2027	41	4,274	34,405
2028	42	4,264	38,669
2029	43	4,253	42,922
2030	44	4,243	47,165
2031	45	4,232	51,397
2032	46	4,222	55,619
2033	47	4,211	59,830
2034	48	4,201	64,031
2035	49	4,190	68,221
2036	50	4,180	72,401
2037	51	4,170	76,571
2038	52	4,160	80,731
2039	53	4,149	84,880
2040	54	4,139	89,019
2041	55	4,129	93,148
2042	56	4,119	97,267
2043	57	4,109	101,376
2044	58	2,818	\$104,194
SNUKIS		\$104,194	

Table 23

LOSS OF PAST ACCOMPANIMENT TO SIERRA
2019 - 2023

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	32	\$1,030	\$1,030
2020	33	3,741	4,771
2021	34	3,958	8,729
2022	35	4,195	12,924
2023	36	3,954	\$16,878
SNUKIS		\$16,878	

Table 24

PRESENT VALUE OF FUTURE ACCOMPANIMENT TO SIERRA
2023 - 2044

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	36	\$367	0.99894	\$367	\$367
2024	37	4,364	0.98661	4,306	4,673
2025	38	4,408	0.97443	4,295	8,968
2026	39	4,452	0.96240	4,285	13,253
2027	40	4,497	0.95052	4,274	17,527
2028	41	4,542	0.93878	4,264	21,791
2029	42	4,587	0.92719	4,253	26,044
2030	43	4,633	0.91574	4,243	30,287
2031	44	4,679	0.90444	4,232	34,519
2032	45	4,726	0.89327	4,222	38,741
2033	46	4,773	0.88224	4,211	42,952
2034	47	4,821	0.87135	4,201	47,153
2035	48	4,869	0.86059	4,190	51,343
2036	49	4,918	0.84997	4,180	55,523
2037	50	4,967	0.83948	4,170	59,693
2038	51	5,017	0.82911	4,160	63,853
2039	52	5,067	0.81888	4,149	68,002
2040	53	5,118	0.80877	4,139	72,141
2041	54	5,169	0.79878	4,129	76,270
2042	55	5,221	0.78892	4,119	80,389
2043	56	5,273	0.77918	4,109	84,498
2044	57	3,648	0.77257	2,818	\$87,316
SIERRA SNUKIS				\$87,316	

Table 25

PRESENT VALUE OF NET ACCOMPANIMENT TO SIERRA
2019 - 2044

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	32	\$1,030	\$1,030
2020	33	3,741	4,771
2021	34	3,958	8,729
2022	35	4,195	12,924
2023	36	4,321	17,245
2024	37	4,306	21,551
2025	38	4,295	25,846
2026	39	4,285	30,131
2027	40	4,274	34,405
2028	41	4,264	38,669
2029	42	4,253	42,922
2030	43	4,243	47,165
2031	44	4,232	51,397
2032	45	4,222	55,619
2033	46	4,211	59,830
2034	47	4,201	64,031
2035	48	4,190	68,221
2036	49	4,180	72,401
2037	50	4,170	76,571
2038	51	4,160	80,731
2039	52	4,149	84,880
2040	53	4,139	89,019
2041	54	4,129	93,148
2042	55	4,119	97,267
2043	56	4,109	101,376
2044	57	2,818	\$104,194
SNUKIS		\$104,194	

Table 26

LOSS OF PAST LVL TO EDWARD
2019 - 2023

YEAR	AGE	RVL	CUMULATE
****	***	*****	*****
2019	56	\$42,757	\$42,757
2020	57	145,124	187,881
2021	58	155,341	343,222
2022	59	163,108	506,330
2023	60	152,240	\$658,570
SNUKIS		\$658,570	

Table 27

PRESENT VALUE OF FUTURE LVL TO EDWARD
2023 - 2044

YEAR	AGE	RVL	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	60	\$14,130	0.99894	\$14,115	\$14,115
2024	61	166,370	0.98661	164,142	178,257
2025	62	166,370	0.97443	162,116	340,373
2026	63	166,370	0.96240	160,114	500,487
2027	64	166,370	0.95052	158,138	658,625
2028	65	166,370	0.93878	156,185	814,810
2029	66	166,370	0.92719	154,257	969,067
2030	67	166,370	0.91574	152,352	1,121,419
2031	68	166,370	0.90444	150,472	1,271,891
2032	69	166,370	0.89327	148,613	1,420,504
2033	70	166,370	0.88224	146,778	1,567,282
2034	71	166,370	0.87135	144,966	1,712,248
2035	72	166,370	0.86059	143,176	1,855,424
2036	73	166,370	0.84997	141,410	1,996,834
2037	74	166,370	0.83948	139,664	2,136,498
2038	75	166,370	0.82911	137,939	2,274,437
2039	76	166,370	0.81888	136,237	2,410,674
2040	77	166,370	0.80877	134,555	2,545,229
2041	78	166,370	0.79878	132,893	2,678,122
2042	79	166,370	0.78892	131,253	2,809,375
2043	80	166,370	0.77918	129,632	2,939,007
2044	81	113,952	0.77257	88,036	\$3,027,043
EDWARD SNUKIS				\$3,027,043	

Table 28

PRESENT VALUE OF NET LVL TO EDWARD
2019 - 2044

YEAR	AGE	RVL	CUMULATE
****	***	*****	*****
2019	56	\$42,757	\$42,757
2020	57	145,124	187,881
2021	58	155,341	343,222
2022	59	163,108	506,330
2023	60	166,355	672,685
2024	61	164,142	836,827
2025	62	162,116	998,943
2026	63	160,114	1,159,057
2027	64	158,138	1,317,195
2028	65	156,185	1,473,380
2029	66	154,257	1,627,637
2030	67	152,352	1,779,989
2031	68	150,472	1,930,461
2032	69	148,613	2,079,074
2033	70	146,778	2,225,852
2034	71	144,966	2,370,818
2035	72	143,176	2,513,994
2036	73	141,410	2,655,404
2037	74	139,664	2,795,068
2038	75	137,939	2,933,007
2039	76	136,237	3,069,244
2040	77	134,555	3,203,799
2041	78	132,893	3,336,692
2042	79	131,253	3,467,945
2043	80	129,632	3,597,577
2044	81	88,036	\$3,685,613
SNUKIS		\$3,685,613	

Table 29

LOSS OF PAST RELATIONSHIP TO EDWARD
2019 - 2023

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	31	\$21,378	\$21,378
2020	32	72,562	93,940
2021	33	77,670	171,610
2022	34	81,554	253,164
2023	35	76,120	\$329,284
EDWARD SNUKIS JR.			\$329,284

Table 30

PRESENT VALUE OF FUTURE RELATIONSHIP TO EDWARD
2023 - 2066

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	35	\$7,065	0.99894	\$7,058	\$7,058
2024	36	83,185	0.98661	82,071	89,129
2025	37	83,185	0.97443	81,058	170,187
2026	38	83,185	0.96240	80,057	250,244
2027	39	83,185	0.95052	79,069	329,313
2028	40	83,185	0.93878	78,092	407,405
2029	41	83,185	0.92719	77,128	484,533
2030	42	83,185	0.91574	76,176	560,709
2031	43	83,185	0.90444	75,236	635,945
2032	44	83,185	0.89327	74,307	710,252
2033	45	83,185	0.88224	73,389	783,641
2034	46	83,185	0.87135	72,483	856,124
2035	47	83,185	0.86059	71,588	927,712
2036	48	83,185	0.84997	70,705	998,417
2037	49	83,185	0.83948	69,832	1,068,249
2038	50	83,185	0.82911	68,970	1,137,219
2039	51	83,185	0.81888	68,119	1,205,338
2040	52	83,185	0.80877	67,278	1,272,616
2041	53	83,185	0.79878	66,447	1,339,063
2042	54	83,185	0.78892	65,626	1,404,689
2043	55	83,185	0.77918	64,816	1,469,505
2044	56	83,185	0.76956	64,016	1,533,521
2045	57	83,185	0.76006	63,226	1,596,747
2046	58	83,185	0.75068	62,445	1,659,192
2047	59	83,185	0.74141	61,674	1,720,866
2048	60	83,185	0.73226	60,913	1,781,779
2049	61	83,185	0.72322	60,161	1,841,940
2050	62	83,185	0.71429	59,418	1,901,358
2051	63	83,185	0.70547	58,685	1,960,043
2052	64	83,185	0.69676	57,960	2,018,003
2053	65	83,185	0.68816	57,245	2,075,248
2054	66	83,185	0.67966	56,538	2,131,786
2055	67	83,185	0.67127	55,840	2,187,626
2056	68	83,185	0.66298	55,150	2,242,776
2057	69	83,185	0.65480	54,470	2,297,246
2058	70	83,185	0.64672	53,797	2,351,043
2059	71	83,185	0.63873	53,133	2,404,176
2060	72	83,185	0.63085	52,477	2,456,653
2061	73	83,185	0.62306	51,829	2,508,482
2062	74	83,185	0.61537	51,190	2,559,672
2063	75	83,185	0.60777	50,557	2,610,229
2064	76	83,185	0.60026	49,933	2,660,162
2065	77	83,185	0.59285	49,316	2,709,478
2066	78	79,994	0.58581	46,861	\$2,756,339
EDWARD SNUKIS JR.					\$2,756,339

Table 31

PRESENT VALUE OF NET RELATIONSHIP TO EDWARD
2019 - 2066

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	31	\$21,378	\$21,378
2020	32	72,562	93,940
2021	33	77,670	171,610
2022	34	81,554	253,164
2023	35	83,178	336,342
2024	36	82,071	418,413
2025	37	81,058	499,471
2026	38	80,057	579,528
2027	39	79,069	658,597
2028	40	78,092	736,689
2029	41	77,128	813,817
2030	42	76,176	889,993
2031	43	75,236	965,229
2032	44	74,307	1,039,536
2033	45	73,389	1,112,925
2034	46	72,483	1,185,408
2035	47	71,588	1,256,996
2036	48	70,705	1,327,701
2037	49	69,832	1,397,533
2038	50	68,970	1,466,503
2039	51	68,119	1,534,622
2040	52	67,278	1,601,900
2041	53	66,447	1,668,347
2042	54	65,626	1,733,973
2043	55	64,816	1,798,789
2044	56	64,016	1,862,805
2045	57	63,226	1,926,031
2046	58	62,445	1,988,476
2047	59	61,674	2,050,150
2048	60	60,913	2,111,063
2049	61	60,161	2,171,224
2050	62	59,418	2,230,642
2051	63	58,685	2,289,327
2052	64	57,960	2,347,287
2053	65	57,245	2,404,532
2054	66	56,538	2,461,070
2055	67	55,840	2,516,910
2056	68	55,150	2,572,060
2057	69	54,470	2,626,530
2058	70	53,797	2,680,327
2059	71	53,133	2,733,460
2060	72	52,477	2,785,937
2061	73	51,829	2,837,766
2062	74	51,190	2,888,956
2063	75	50,557	2,939,513
2064	76	49,933	2,989,446
2065	77	49,316	3,038,762
2066	78	46,861	\$3,085,623
EDWARD SNUKIS JR.			\$3,085,623

Table 32

LOSS OF PAST RELATIONSHIP TO SAMANTHA
2019 - 2023

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	33	\$21,378	\$21,378
2020	34	72,562	93,940
2021	35	77,670	171,610
2022	36	81,554	253,164
2023	37	76,120	\$329,284
SNUKIS		\$329,284	

Table 33

PRESENT VALUE OF FUTURE RELATIONSHIP TO SAMANTHA
2023 - 2068

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	37	\$7,065	0.99894	\$7,058	\$7,058
2024	38	83,185	0.98661	82,071	89,129
2025	39	83,185	0.97443	81,058	170,187
2026	40	83,185	0.96240	80,057	250,244
2027	41	83,185	0.95052	79,069	329,313
2028	42	83,185	0.93878	78,092	407,405
2029	43	83,185	0.92719	77,128	484,533
2030	44	83,185	0.91574	76,176	560,709
2031	45	83,185	0.90444	75,236	635,945
2032	46	83,185	0.89327	74,307	710,252
2033	47	83,185	0.88224	73,389	783,641
2034	48	83,185	0.87135	72,483	856,124
2035	49	83,185	0.86059	71,588	927,712
2036	50	83,185	0.84997	70,705	998,417
2037	51	83,185	0.83948	69,832	1,068,249
2038	52	83,185	0.82911	68,970	1,137,219
2039	53	83,185	0.81888	68,119	1,205,338
2040	54	83,185	0.80877	67,278	1,272,616
2041	55	83,185	0.79878	66,447	1,339,063
2042	56	83,185	0.78892	65,626	1,404,689
2043	57	83,185	0.77918	64,816	1,469,505
2044	58	83,185	0.76956	64,016	1,533,521
2045	59	83,185	0.76006	63,226	1,596,747
2046	60	83,185	0.75068	62,445	1,659,192
2047	61	83,185	0.74141	61,674	1,720,866
2048	62	83,185	0.73226	60,913	1,781,779
2049	63	83,185	0.72322	60,161	1,841,940
2050	64	83,185	0.71429	59,418	1,901,358
2051	65	83,185	0.70547	58,685	1,960,043
2052	66	83,185	0.69676	57,960	2,018,003
2053	67	83,185	0.68816	57,245	2,075,248
2054	68	83,185	0.67966	56,538	2,131,786
2055	69	83,185	0.67127	55,840	2,187,626
2056	70	83,185	0.66298	55,150	2,242,776
2057	71	83,185	0.65480	54,470	2,297,246
2058	72	83,185	0.64672	53,797	2,351,043
2059	73	83,185	0.63873	53,133	2,404,176
2060	74	83,185	0.63085	52,477	2,456,653
2061	75	83,185	0.62306	51,829	2,508,482
2062	76	83,185	0.61537	51,190	2,559,672
2063	77	83,185	0.60777	50,557	2,610,229
2064	78	83,185	0.60026	49,933	2,660,162
2065	79	83,185	0.59285	49,316	2,709,478
2066	80	83,185	0.58553	48,707	2,758,185
2067	81	83,185	0.57831	48,107	2,806,292
2068	82	55,609	0.57351	31,892	\$2,838,184

SAMANTHA SNUKIS

\$2,838,184

Table 34

PRESENT VALUE OF NET RELATIONSHIP TO SAMANTHA
2019 - 2068

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	33	\$21,378	\$21,378
2020	34	72,562	93,940
2021	35	77,670	171,610
2022	36	81,554	253,164
2023	37	83,178	336,342
2024	38	82,071	418,413
2025	39	81,058	499,471
2026	40	80,057	579,528
2027	41	79,069	658,597
2028	42	78,092	736,689
2029	43	77,128	813,817
2030	44	76,176	889,993
2031	45	75,236	965,229
2032	46	74,307	1,039,536
2033	47	73,389	1,112,925
2034	48	72,483	1,185,408
2035	49	71,588	1,256,996
2036	50	70,705	1,327,701
2037	51	69,832	1,397,533
2038	52	68,970	1,466,503
2039	53	68,119	1,534,622
2040	54	67,278	1,601,900
2041	55	66,447	1,668,347
2042	56	65,626	1,733,973
2043	57	64,816	1,798,789
2044	58	64,016	1,862,805
2045	59	63,226	1,926,031
2046	60	62,445	1,988,476
2047	61	61,674	2,050,150
2048	62	60,913	2,111,063
2049	63	60,161	2,171,224
2050	64	59,418	2,230,642
2051	65	58,685	2,289,327
2052	66	57,960	2,347,287
2053	67	57,245	2,404,532
2054	68	56,538	2,461,070
2055	69	55,840	2,516,910
2056	70	55,150	2,572,060
2057	71	54,470	2,626,530
2058	72	53,797	2,680,327
2059	73	53,133	2,733,460
2060	74	52,477	2,785,937
2061	75	51,829	2,837,766
2062	76	51,190	2,888,956
2063	77	50,557	2,939,513
2064	78	49,933	2,989,446
2065	79	49,316	3,038,762
2066	80	48,707	3,087,469
2067	81	48,107	3,135,576
2068	82	31,892	\$3,167,468

PRESENT VALUE OF NET RELATIONSHIP TO SAMANTHA
2019 - 2068

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
SNUKIS		\$3,167,468	

Table 35

LOSS OF PAST RELATIONSHIP TO SIERRA
2019 - 2023

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	32	\$17,103	\$17,103
2020	33	58,050	75,153
2021	34	62,136	137,289
2022	35	65,243	202,532
2023	36	60,896	\$263,428
SNUKIS		\$263,428	

Table 36

PRESENT VALUE OF FUTURE RELATIONSHIP TO SIERRA
2023 - 2069

YEAR	AGE	RELATIONSHIP	DISCOUNT FACTOR	PRESENT VALUE	CUMULATE
****	***	*****	*****	*****	*****
2023	36	\$5,652	0.99894	\$5,646	\$5,646
2024	37	66,548	0.98661	65,657	71,303
2025	38	66,548	0.97443	64,846	136,149
2026	39	66,548	0.96240	64,046	200,195
2027	40	66,548	0.95052	63,255	263,450
2028	41	66,548	0.93878	62,474	325,924
2029	42	66,548	0.92719	61,703	387,627
2030	43	66,548	0.91574	60,941	448,568
2031	44	66,548	0.90444	60,189	508,757
2032	45	66,548	0.89327	59,445	568,202
2033	46	66,548	0.88224	58,711	626,913
2034	47	66,548	0.87135	57,987	684,900
2035	48	66,548	0.86059	57,271	742,171
2036	49	66,548	0.84997	56,564	798,735
2037	50	66,548	0.83948	55,866	854,601
2038	51	66,548	0.82911	55,176	909,777
2039	52	66,548	0.81888	54,495	964,272
2040	53	66,548	0.80877	53,822	1,018,094
2041	54	66,548	0.79878	53,157	1,071,251
2042	55	66,548	0.78892	52,501	1,123,752
2043	56	66,548	0.77918	51,853	1,175,605
2044	57	66,548	0.76956	51,213	1,226,818
2045	58	66,548	0.76006	50,580	1,277,398
2046	59	66,548	0.75068	49,956	1,327,354
2047	60	66,548	0.74141	49,339	1,376,693
2048	61	66,548	0.73226	48,730	1,425,423
2049	62	66,548	0.72322	48,129	1,473,552
2050	63	66,548	0.71429	47,535	1,521,087
2051	64	66,548	0.70547	46,948	1,568,035
2052	65	66,548	0.69676	46,368	1,614,403
2053	66	66,548	0.68816	45,796	1,660,199
2054	67	66,548	0.67966	45,230	1,705,429
2055	68	66,548	0.67127	44,672	1,750,101
2056	69	66,548	0.66298	44,120	1,794,221
2057	70	66,548	0.65480	43,576	1,837,797
2058	71	66,548	0.64672	43,038	1,880,835
2059	72	66,548	0.63873	42,506	1,923,341
2060	73	66,548	0.63085	41,982	1,965,323
2061	74	66,548	0.62306	41,463	2,006,786
2062	75	66,548	0.61537	40,952	2,047,738
2063	76	66,548	0.60777	40,446	2,088,184
2064	77	66,548	0.60026	39,946	2,128,130
2065	78	66,548	0.59285	39,453	2,167,583
2066	79	66,548	0.58553	38,966	2,206,549
2067	80	66,548	0.57831	38,485	2,245,034
2068	81	66,548	0.57351	38,166	2,283,200
2069	82	49,227	0.57351	28,232	\$2,311,432

SIERRA SNUKIS

\$2,311,432

Table 37

PRESENT VALUE OF NET RELATIONSHIP TO SIERRA
2019 - 2069

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2019	32	\$17,103	\$17,103
2020	33	58,050	75,153
2021	34	62,136	137,289
2022	35	65,243	202,532
2023	36	66,542	269,074
2024	37	65,657	334,731
2025	38	64,846	399,577
2026	39	64,046	463,623
2027	40	63,255	526,878
2028	41	62,474	589,352
2029	42	61,703	651,055
2030	43	60,941	711,996
2031	44	60,189	772,185
2032	45	59,445	831,630
2033	46	58,711	890,341
2034	47	57,987	948,328
2035	48	57,271	1,005,599
2036	49	56,564	1,062,163
2037	50	55,866	1,118,029
2038	51	55,176	1,173,205
2039	52	54,495	1,227,700
2040	53	53,822	1,281,522
2041	54	53,157	1,334,679
2042	55	52,501	1,387,180
2043	56	51,853	1,439,033
2044	57	51,213	1,490,246
2045	58	50,580	1,540,826
2046	59	49,956	1,590,782
2047	60	49,339	1,640,121
2048	61	48,730	1,688,851
2049	62	48,129	1,736,980
2050	63	47,535	1,784,515
2051	64	46,948	1,831,463
2052	65	46,368	1,877,831
2053	66	45,796	1,923,627
2054	67	45,230	1,968,857
2055	68	44,672	2,013,529
2056	69	44,120	2,057,649
2057	70	43,576	2,101,225
2058	71	43,038	2,144,263
2059	72	42,506	2,186,769
2060	73	41,982	2,228,751
2061	74	41,463	2,270,214
2062	75	40,952	2,311,166
2063	76	40,446	2,351,612
2064	77	39,946	2,391,558
2065	78	39,453	2,431,011
2066	79	38,966	2,469,977
2067	80	38,485	2,508,462
2068	81	38,166	2,546,628

Table 37 (Cont.)

PRESENT VALUE OF NET RELATIONSHIP TO SIERRA
2019 - 2069

YEAR	AGE	RELATIONSHIP	CUMULATE
****	***	*****	*****
2069	82	28,232	\$2,574,860
SNUKIS		\$2,574,860	